

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: ) In proceedings under Chapter 13  
          ) Honorable Donald R. Cassling  
Laurie Rose Crane, )  
          Debtor.      ) Case No. 19 B 05072

**RESPONSE TO DEBTOR'S MOTION TO SELL REAL PROPERTY**

COMES NOW TOWD POINT MORTGAGE TRUST 2019-4, U.S. BANK NATIONAL ASSOCIATION, AS INDENTURE TRUSTEE ("Secured Creditor"), by counsel, and responds as follows to Debtor's Motion to Sell Real Property ("Debtor's Motion"):

1. Secured Creditor holds a security interest in the Debtor's real property located at 5858 N Sheridan Road Unit 908, Chicago, IL 60660 by virtue of a Mortgage recorded on April 5, 2007 as Doc #0709540102 of the public records of Cook County, Illinois.
2. Secured Creditor does not oppose Debtor's Motion so long as Secured Creditor's lien is paid in full subject to a payoff quote obtained at the time of closing.
3. Further, Secured Creditor does not oppose Debtor's Motion so long as the sale is final within 90 days of the Order Granting Debtor's Motion. If the sale is not final within 90 days of the order granting Debtor's Motion, Debtor's Motion should be deemed moot.

WHEREFORE, Secured Creditor respectfully prays that this Court grant Debtor's Motion to Sell Real Property subject to the above terms, and for any such other and further relief as this Court may deem just and proper.

RIEZMAN BERGER, P.C.

/s/ Kathryn A. Klein  
Kathryn A. Klein, #06199235  
7700 Bonhomme Avenue, 7th Floor  
St. Louis, Missouri 63105  
(314) 727-0101  
Attorney for Secured Creditor

**CERTIFICATE OF SERVICE**

The undersigned states that I served the foregoing document upon the Debtor by postage prepaid, in the United States Mail, by first-class mail and upon the other parties named below via electronic means, on April 21, 2020.

Laurie Rose Crane  
5858 N. Sheridan Rd., Apt 908  
Chicago IL 60660

Debtor

Joseph S. Davidson  
2500 S. Highland Ave, Suite 200  
Lombard IL 60148

Attorney for Debtor

Tom Vaughn  
55 E. Monroe St., Suite 3850  
Chicago IL 60603

Chapter 13 Trustee

Office of the United States Trustee  
US Trustee - ILN  
219 S. Dearborn St., Rm. 873  
Chicago, IL 60604

/s/ Kathryn A. Klein